

EXHIBIT

A

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August 1, 2022

Cory Itkin  
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Re: Case No. SA-22-CV-0080-XR; *Gillis v. Community Products, LLC*, United States District Court for the Western District of Texas; Our File No. 7840-001.

Dear Cory:

I have reviewed Plaintiffs' written discovery responses and note that Plaintiffs have improperly objected to and/or failed to provide complete responses to several of the discovery requests. Specifically, there are concerns related to the following discovery responses:

- Jennifer Gillis' Answer to Interrogatory Nos. 5, 6, 13, 14, 15 and 17;
- Tory Gillis' Answer to Interrogatory Nos. 11 and 12;
- Estate of J.G.'s Answer to Interrogatory Nos. 14 and 16; and
- Plaintiffs' Responses to Request for Production Nos. 1-13, 16-24, 26-39, 49-51, 53, 58, 60, 61 and 64.

I ask that Plaintiffs amend these discovery responses to remove the improper objections and provide responsive information so that we can have a full understanding of their claims prior to taking their depositions. Please let me know if you can provide the amended discovery responses within the next 14 days. If you have any questions or concerns, or wish to discuss this matter in greater detail, please don't hesitate to contact me.

Sincerely,

BROCK ♦ GUERRA

BY: CELIA GUERRA  
 JOHN A. GUERRA  
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